

DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

POSTAL RATE AND FEE CHANGES, 1997

Docket No. R97-1

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS
PATELUNAS TO INTERROGATORY OF UNITED PARCEL SERVICE REDIRECTED
FROM WITNESS SHARKEY
(UPS/USPS-T33-58)

The United States Postal Service hereby provides the revised response of witness Patelunas to the following interrogatory of United Parcel Service: UPS/USPS-T33-58, filed on September 17, 1997 and redirected from witness Sharkey. The original response was filed on September 30, 1997.

The revised response is provided pursuant to Presiding Officer's Ruling No. R97-1/62, issued November 17, 1997. The revised response provides the PMPC costs from the pages of Library Reference H-12 referenced in the original response. Actual FY 1998 costs under the PMPC contract cannot be determined since the year has not concluded. Thus, the costs included in Library Reference H-12 for Test Year 1998 remain a reasonable estimate of the "portion of the total price to be paid by the Postal Service under the PMPC contract that relates to test year (FY 1998) operation for the PMPC network."

The interrogatory is stated verbatim and is followed by the response.

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Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
December 3, 1997

Response of United States Postal Service Witness Patelunas
to Interrogatories of
United Parcel Service
(Redirected from Witness Sharkey USPS-T-33)
Revised 12/03/97

UPS/USPS-T33-58

Please provide that portion of the total price to be paid by the Postal Service under the PMPC contract that relates to test year (FY 1998) operations for the PMPC network.

UPS/USPS-T33-58 Response:

My response to UPS/USPS-T33-35, redirected from Witness Sharkey, referred to USPS Library Reference H-12 pages: 98, 100, 122 and 127 as the sources of the of the PMPC Phase I contract costs. For Test Year 1998, the costs are found on pages 100 and 122 of USPS-LR-H-12 and they are (in 000's):

HQ Programs	Segment 16	Component 187	\$101,813	page 122
Air Transportation	Segment 14	Component 142	\$100,000	page 100
Highway Transport	Segment 14	Component 143	\$100,000	page 100.

Summing the amounts shown above yields \$301,813,000 in PMPC Contract costs projected for Test Year 1998 in USPS-LR-H-12.

DECLARATION

I, Richard Patelunas, declare under penalty of perjury that the foregoing answers to interrogatories are true and correct to the best of my knowledge, information, and belief.

A handwritten signature in black ink, appearing to read "Richard Patelunas", is written over a horizontal line.

Dated: 12/3/97

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.


Susan M. Duchek

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260-1137
(202) 268-2990; Fax -5402
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